AIRTOUCH™
Communications

The new name for PacTel

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October 19, 1994

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OCT 19 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

EX PARTE

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

RE: PR Docket 93-61, Automatic Vehicle Monitoring Systems

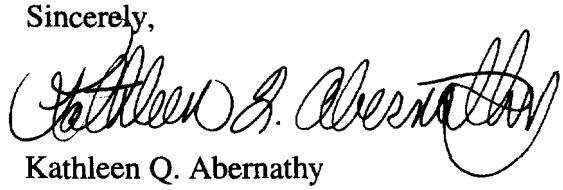
Dear Mr. Caton:

On behalf of AirTouch Teletrac, we submit the attached material. Please associate this material with the above-referenced proceeding.

Two copies of this notice were submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me at 202-293-4960 should you have any questions or require additional information concerning this matter.

Sincerely,



Kathleen Q. Abernathy

Attachment

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October 18, 1994

EX PARTE

Ms. Ruth Milkman
Office of Chairman Hundt
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554

Re: PR Docket 93-61, Written Ex Parte Presentation

Dear Ruth:

As you are aware, representatives of the Part 15 community and the multilateration AVM/LMS community participated in a technical meeting on Wednesday, October 12, 1994. Attached is the information AirTouch Teletrac distributed at the meeting.

I want to emphasize that Teletrac continues to urge the Commission to issue an order in the vehicle location proceeding as soon as possible. There is no need to delay the proceeding while these technical discussions are ongoing. The technical exchange that is currently taking place will, however, enhance the ability of all users of the band to coexist with a minimum of interference within the spectrum ultimately allocated for LMS. As Teletrac has pointed out in previous filings, we have been operating in six cities for up to four years and instances of interference have been negligible. Therefore, we have real world experience to share with the Part 15 community and other LMS companies -- experience that demonstrates the feasibility of Part 15 and LMS coexistence.

A follow-up meeting of the group is scheduled for Monday, October 24. In the meantime, if you have any questions, do not hesitate to contact me.

Sincerely,

Kathleen Q. Abernathy

cc: Rosalind Allen
Ron Netro
Henry Rivera

Teletrac's Expectations for This Meeting.

- To understand the purpose of the proposed testing.
- To understand how the test results are proposed to be applied to represent the real-world.
- To understand how the testing is proposed to affect the rulemaking.
- To understand the testing proposal(s).
- To express our concerns with testing.

Issues and Concerns Regarding Testing... 1

- **Testing a receiver alone will not reflect system performance.**
  - **Testing, if done at all, must be done at a system level.**

- **Any test program, no matter how extensive, can only assess a limited number of "assumed likely" scenarios.**

- **Should not consider system parameters to assess system performance (testing should be blind).**
  - Can lead to test tailoring.
  - Applying a limited set of parameters in other than their actual implementation and relationship in the real system will not yield high fidelity results.

- **Testing, as understood to have been proposed, will at best indicate relative performance of different RECEIVERS in given scenarios. How these results relate to real-world SYSTEM performance will be subject to interpretation and extensive debate.**

Issues and Concerns Regarding Testing... 2

- **Teletrac has designed and deployed a system that has been commercially operating for 2 to 4 years in 6 major metropolitan areas that is compatible with the vast preponderance of deployed devices in the band. The isolated cases of interference that have occurred have been easily and amicably resolved.**

- **The testing proposal seems to suggest that LMS systems should be (re-)designed in a public forum or by a committee based on the limited testing. This does not seem practical. Years of R&D and operational experience have gone into the design of Teletrac's system.**

- **In any test (or model) of the complexity required there are many variables subject to interpretation, estimation and error:**

  - **The proportion and likelihood of selected scenarios actually occurring in real-world**
  - **Usage and deployment estimates and distributions compared to real-world**
  - **Timing, space, frequency, power and bandwidth distributions and relationships**

- **Test or modeling results that do not agree with actually observed real-world results will be strongly challenged. Testing must pass the "smell" test.**

Teletrac technical information on record.

- Receiver C/N performance.
- Mobile unit and fixed site transmit power levels.
- Frequencies and Bandwidths.
- Burst times.
- Receiver deployment.
- Test results.
- Analysis and modeling results.
- Computer simulation results.
- Real-world experience with interference.